

# Exhibit D

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,  
INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**HARVARD’S OBJECTIONS AND RESPONSES TO  
PLAINTIFF’S FIRST SET OF INTERROGATORIES**

Defendant President and Fellows of Harvard College (Harvard Corporation) (“Harvard”), by and through its undersigned counsel, hereby responds and objects to Plaintiffs’ First Set of Interrogatories (“Interrogatories”).

**GENERAL OBJECTIONS TO ALL INTERROGATORIES**

Each of Harvard’s responses is subject to and incorporates the following general objections. The assertion of the same, similar, or additional objections, or a partial response to any individual Interrogatory does not waive any of Harvard’s general objections.

1. Harvard objects to each and every Interrogatory to the extent it calls for information that is not relevant to the parties’ claims or defenses in this case.

2. Harvard objects to each and every Interrogatory to the extent it seeks documents and information that are protected from disclosure by the attorney-client privilege, the work product doctrine, or any other privilege, protection, or immunity. Any production by Harvard, inadvertent or otherwise, of information or documents protected from disclosure by any such

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4. *Describe all categories of documents and data from any time used by Harvard in determining whether any particular applicant should be admitted.*

In addition to and specifically incorporating the foregoing General Objections, Harvard objects to Interrogatory No. 4 on the grounds that it is overly broad and unduly burdensome to the extent it seeks information beyond that which is sufficient to show Harvard’s relevant policies and practices regarding undergraduate freshman admissions. Harvard further objects to this Interrogatory to the extent it seeks information from any time. Harvard further objects that the term “documents and data” is vague and ambiguous as used in this Interrogatory.

Subject to and without waiving the foregoing General and Specific Objections, Harvard states that its consideration of an application for undergraduate freshman admission is not limited

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to any specific category of documents or data, but rather extends to a wide variety of factors.

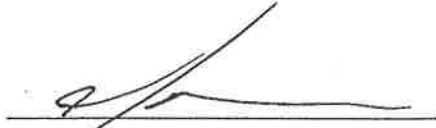
These factors may include an applicant’s intellectual imagination, strength of character, ability to exercise good judgment, grades and coursework, recommendation letters, extracurricular activities, creative or athletic ability, employment, leadership experience and potential, accomplishments and awards, standardized test scores, personal essays, reports from alumni or admissions officer interviews, relationship to a Harvard alumnus/a, socioeconomic status, home state or country, race or ethnicity, and faculty evaluations. No one factor is determinative, and Harvard considers these factors as part of a holistic review to determine which applicants will best contribute to, and thrive on, the Harvard campus.

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**VERIFICATION**

On behalf of Defendant President and Fellows of Harvard College (“Harvard”) and in my capacity as Assistant Director of Financial Aid and Senior Admissions Officer, I have read the foregoing Responses to Plaintiff’s First Set of Interrogatories, and they are true and correct to the best of my knowledge. I do not necessarily have direct personal knowledge of every fact contained herein. The response was prepared with the assistance of Harvard employees and with the assistance and advice of counsel. The answers are based on records and information currently available, and I have relied on Harvard employees to gather the responsive information. I reserve the right to make changes in or additions to any of these answers if it appears at any time that errors or omissions have been made or if more accurate or complete information becomes available. I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30 day of June 2015.

A handwritten signature in black ink, appearing to read 'Charlene Kim', is written over a horizontal line.

Charlene Kim

Assistant Director of Financial Aid and Senior Admissions Officer